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March 25, 2021

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Velez*, 19 Cr. 862 (Deeshuntee Stevens)

Dear Judge Caproni:

I write on behalf of my client, Deeshuntee Stevens, to respectfully request permission for Mr. Stevens to travel from Rochester, NY, to New York City, on April 4, to visit his daughters on Easter Sunday. Mr. Stevens' daughters reside in the Bronx with their mother, Melissa Blondet, one of the co-signors for Mr. Stevens' bond. If granted permission, Mr. Stevens will travel by bus to and from New York City, leaving Rochester in the early morning hours of April 4, and returning in the early morning hours of April 5. He will not stay overnight in New York City.

Mr. Stevens plans to celebrate Easter at Ms. Blondet's residence. In addition to Mr. Stevens, there will be five attendees at the gathering, all of whom reside in the same household and are at low risk for severe COVID-19 disease, including: Mr. Stevens' two daughters, who are thirteen and eight years old; Ms. Blondet, with whom Mr. Stevens maintains a close relationship; and Ms. Blondet's two other children, an eighteen-year-old daughter and a two-year-old son. The gathering at Ms. Blondet's home is consistent with New York State's rules with

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respect to gatherings at private residences because only six people will be present.¹ In addition, on February 3, 2021, Mr. Stevens received his second dose of the Pfizer-BioNTech COVID-19 vaccine, so he is now fully vaccinated. The gathering is thus also consistent with current CDC guidelines, which permit fully vaccinated people to “[v]isit with unvaccinated people from a single household who are at low risk for severe COVID-19 disease indoors without wearing masks or physical distancing.”²

Pretrial Services has informed us that it objects to this request as a matter of policy, as it objects to all leave requests for “social activities.” Pretrial Services has authorized us to note that per Mr. Stevens’ supervising officer, he is in compliance with the conditions of his release. The United States Attorney’s Office defers to the position of Pretrial Services.

As the Court is aware, on October 7, 2020, your Honor granted Mr. Stevens’ request to travel to New York City on the occasion of his daughter’s thirteenth birthday, with the consent of the government. Mr. Stevens’ trip was without incident. Since November 2020, Mr. Stevens has maintained employment in Rochester, and he has adapted well to supervision. Mr. Stevens also sought permission to travel to New York City on two other occasions—to spend Thanksgiving and Christmas with his daughters. The government opposed those requests, and your Honor denied them in part due to the risk of COVID-19 at that time, noting concerns about mixing individuals from more than one household and the round trip between Rochester and New York City.

As the Court is also aware, on August 21, 2020, your Honor ordered Mr. Stevens released on bail, with the consent of the government, on conditions including: (1) a \$100,000 personal recognizance bond, signed by Mr. Stevens and co-signed by three financially responsible persons; (2) home detention with electronic monitoring, except to attend work, to seek employment (with agreement of the office of Pretrial Services as to the specifics), and for medical visits and legal visits, at the Rochester, New York home of Jesseivett Orta, a close family friend serving as third-party custodian; and (3) travel restricted to the state of New York.

¹ See New York State, *Travel, Large Gatherings and Quarantines*, <https://coronavirus.health.ny.gov/travel-large-gatherings-and-quarantines> (“Previously limited to no more than 10 people, effective March 22, 2021, gatherings statewide at private residences will be limited to 10 people indoors and 25 people outdoors.”).

² Centers for Disease Control and Prevention, *Interim Public Health Recommendations for Fully Vaccinated People*, <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated-guidance.html> (last updated Mar. 8, 2021).

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Mr. Stevens is charged in the above-referenced matter with conspiracy to distribute heroin, fentanyl and other narcotics, in violation of 21 U.S.C. §§ 841(a)(1), 846, and possession of a firearm during and in relation to a drug trafficking offense, in violation of 18 U.S.C. §§ 924(c), 2.

Respectfully submitted,

s/ Jocelyn E. Strauber

cc: Assistant U.S. Attorney Adam S. Hobson
Assistant U.S. Attorney Elinor L. Tarlow
U.S. Pretrial Services Officer Jonathan Lettieri
U.S. Pretrial Services Officer Jeremy Bedette

Application GRANTED. Mr. Stevens must provide pretrial services with contact information for Ms. Blondet.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

Date: March 26, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE